

NJ
22c149

U.S. DISTRICT COURT
EASTERN DISTRICT - WI
FILED

2022 NOV -8 P 12: 32

CLERK OF COURT

Exhibit C



Jasmine Oliver <prosejasmine804@gmail.com>

Oliver v. Amazon RE: Court Ordered Conference

6 messages

Kaiser, Casey <CKaiser@littler.com>

Fri, Aug 5, 2022 at 6:41 AM

To: Jasmine Oliver <prosejasmine804@gmail.com>

Cc: "Anderson, Sofija" <SVAnderson@littler.com>

Good morning,

There are several inaccuracies in your summary of our conversation below.

First, we will be providing you blank authorizations to obtain medical records directly from your providers. As a starting point, we are willing to narrow our inquiry into your medical records that related to your alleged disabilities in the case and/or that are relevant to your claims for compensatory damages. Whether we may want to collect additional medical records is an issue for another day.

Second, regarding the video surveillance, I asked you to clarify—in writing—what video you are seeking—i.e., provide dates, times, description of events, etc. Because I don't know exactly what video you are seeking, I don't believe this issue is ripe for either a conference with Judge Joseph or motion practice.

Thanks.

Casey Kaiser

Attorney at Law

414.291.4073 direct, 262.853.0693 mobile, 414.291.5526 fax

CKaiser@littler.com



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111 East Kilbourn Avenue, Suite 1000, Milwaukee, WI 53202

From: Jasmine Oliver <prosejasmine804@gmail.com>**Sent:** Thursday, August 4, 2022 8:08 PM**To:** Kaiser, Casey <CKaiser@littler.com>**Cc:** Anderson, Sofija <SVAnderson@littler.com>**Subject:** Re: Court Ordered Conference

Hello,

Thanks for attending the conference today at 4:00pm regarding discovery!

In summary both parties discussed my medical records as well as the video surveillance.

The plaintiff, myself, agreed to provide medical records discovery only pertaining to issues within the ADA claims.

The defendant, amazon.com stated that they did not have the video surveillance, and stated that they did not think they were required to preserve two years of video surveillance evidence. The plaintiff responded by stating that the eeoc and ERD mailed a complaint which instructed the defendant to preserve evidence which was provided October of 2019 through the end of her employment June 18th, 2020.

The plaintiff stated that she would like to proceed forward with attending a conference with Judge Joseph to work out these discovery issues prior to filing a motion concerning spoliation.

In good faith, please advise whether you have the video surveillance, or not as well as a time to meet with Judge Joseph concerning these issues.

As an attorney I'm confident that you are aware that spoliation Courts have a number of options in imposing sanctions for spoliation, ranging in severity from a default judgment against a party or dismissal of a defendant defenses to such as declaring specified facts to be established, and preventing contradictory evidence.

I'm sure you are well aware of federal rule of civil procedure 37 as well as adverse inference.

I look forward to hearing from you soon regarding a time to attend a conference with judge Joseph.

Thanks,

Jasmine Oliver

On Tue, Aug 2, 2022 at 3:48 PM Jasmine Oliver <prosejasmine804@gmail.com> wrote:

Hello,

4:00 Thursday works for me.

Thanks,

Jasmine Oliver

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From: Jasmine <prosejasmine804@gmail.com>

Sent: Tuesday, August 2, 2022 2:37 PM

To: Kaiser, Casey <CKaiser@littler.com>

Cc: Anderson, Sofija <SVAnderson@littler.com>

Subject: RE: Court Ordered Conference

Casey,

Does 5:30pm today work for a conference call? If you are unavailable during that time I am available on Thursday as well.

Thanks,

Jasmine Oliver

414-748-3881

From: Kaiser, Casey
Sent: Friday, July 22, 2022 10:12 AM
To: Jasmine Oliver
Cc: Anderson, Sofija
Subject: RE: Court Ordered Conference

I hope you are doing OK. Any time on August 2 works for me.

PS, feel free to refer to us by our first names.

Casey Kaiser

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From: Jasmine Oliver <prosejasmine804@gmail.com>
Sent: Friday, July 22, 2022 10:09 AM
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Cc: Anderson, Sofija <SVAnderson@littler.com>
Subject: Re: Court Ordered Conference

Kaiser and Anderson,

I'm currently recovering from surgery, sorry for the last response! Does August 2nd or 4th work for you?

Please let me know what works best for you as well as the time!

Thanks,

Jasmine Oliver

On Tue, Jul 19, 2022 at 12:16 PM Kaiser, Casey <CKaiser@littler.com> wrote:

Hello,

I am currently available Thursday afternoon, after 3:00 pm.

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111 East Kilbourn Avenue, Suite 1000, Milwaukee, WI 53202

From: Jasmine Oliver <prosejasmine804@gmail.com>

Sent: Tuesday, July 19, 2022 12:15 PM

To: Anderson, Sofija <SVAnderson@littler.com>

Cc: Kaiser, Casey <CKaiser@littler.com>

Subject: Court Ordered Conference

Anderson,

I hope that your day is going as great as mine!

I'm contacting you to schedule a designated date and time regarding a conference! As stated in our most recent zoom conference my off days are Tuesday and Thursday, so when's a good time for us to participate in a conference?

I look forward to hearing from you!

Thanks,

Jasmine Oliver

Kind regards,

[Redacted Signature]

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Jasmine Oliver <prosejasmine804@gmail.com>
To: "Kaiser, Casey" <CKaiser@littler.com>

Fri, Aug 5, 2022 at 7:26 AM

Casey,

Our last meeting with the ERD you stated that you provided all of the evidence, along with ALJ Gelhard decision stating that you provided all the evidence, which I know to be false.

You stated that yesterday that you were unsure what I was referring to concerning the surveillance. Should I attached the recording of you stating that you don't have any of the surveillance footage during our ERD conference? My phone does automatically record any incoming calls.

As stated during our conversation I'm referring to footage between July 2019, through June 18,2020.

Either you have the footage, or you don't? This is a simple yes or no question! If you don't I think it's best if we get the Judge involved.

Thanks,
Jasmine Oliver
[Quoted text hidden]

--

Kind regards,

Jasmine Oliver



Jasmine Oliver

4146401505 | prosejasmine804@gmail.com
mugsoliverjasmine@gmail.com
8221 W. Oklahoma Ave Milwaukee, WI 53219

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"Pessimism leads to weakness, optimism to power." - William James.



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To: "Anderson, Sofija" <SVAnderson@littler.com>, "Kaiser, Casey" <CKaiser@littler.com>
Cc: jasmine oliver <mugsoliverjasmine@gmail.com>

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[Quoted text hidden]

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To: Jasmine Oliver <prosejasmine804@gmail.com>, "Anderson, Sofija" <SVAnderson@littler.com>
Cc: jasmine oliver <mugsoliverjasmine@gmail.com>

Mon, Aug 8, 2022 at 1:37 PM

You still haven't complied with my request that you specify in writing what footage it is that you are asking for. I can't respond to your other questions until that happens. Thank you.

Casey Kaiser
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From: Jasmine Oliver <prosejasmine804@gmail.com>
Sent: Friday, August 5, 2022 7:27 AM
To: Anderson, Sofija <SVAnderson@littler.com>; Kaiser, Casey <CKaiser@littler.com>
Cc: jasmine oliver <mugsoliverjasmine@gmail.com>
Subject: Fwd: Oliver v. Amazon RE: Court Ordered Conference

[EXTERNAL E-MAIL]

----- Forwarded message -----

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Jasmine Oliver <prosejasmine804@gmail.com>
To: "Kaiser, Casey" <CKaiser@littler.com>

Mon, Aug 8, 2022 at 1:54 PM

Casey,

As stated during our conference and in my previous email, please refer to the motion to dismiss ERD complaints that you provided and you'll find that the surveillance between the dates of July 2019 through June 18th, 2020, which are essential to my claims. Cr201902057, lists cameras/ surveillance as supporting evidence to my claims; therefore, because I am asserting that I was discriminated on a daily basis and the defendant was notified it should have prompted a litigation hold that the surveillance footage would be requested.

All surveillance of all parking lots, all foyer, locker rooms, all hr room footage, all green mile footage, all giftwrap footage, all stow area footage, all pick footage, all afe1, footage, all hallway footage, all afe 2 footage, all security guard tower footage. All managers tower footage all footage near stairs footage, all breakroom footage, all afe 2 footage, all single department footage. In conclusion as stated before all footage between July-June 18th, 2020.

In addition, as an attorney I'm sure you are aware that this is case surrounds the conditions of my employment which makes all footage between those dates relevant and essential to my claims.

Thanks,
Jasmine Oliver
[Quoted text hidden]

—

Kind regards,

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